

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- against - :

MINH QUANG PHAM, :

Defendant. :

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12 Cr. 423 (AJN)

**NOTICE OF MOTION
TO DISMISS COUNTS 5-9,
AND FOR PRODUCTION
AND IDENTIFICATION OF
EXCULPATORY MATERIAL**

PLEASE TAKE NOTICE, that upon the annexed Declaration of Bobbi C. Sternheim, Esq., and all prior papers and proceedings herein, the defendant, MINH QUANG PHAM, will move before the Honorable Alison J. Nathan, United States District Judge for the Southern District of New York, at the United States Courthouse located at 40 Centre Street, New York, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for the dismissal of Counts Five, Six, Seven, Eight, and Nine, of the Superseding Indictment (S-1) and for the production and identification of exculpatory material and information, as set forth in the accompanying Memorandum of Law, and for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York
August 30, 2021

/s/ Joshua L. Dratel
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Attorneys for Defendant Minh Quang Pham

To: CLERK OF THE COURT

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK